

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

OCT 2 0 2020

Clerk, U. S. District Court Eastern District of Tennessee At Knoxville

At Knoxville
) No. 3:20-CR- <u>97</u>
)
) JUDGES/
)
)
)
)
)
)

INDICTMENT

COUNT ONE

The Grand Jury charges that, from on or about January 1, 2020, through on or about

October 20, 2020, within the Eastern District of Tennessee and elsewhere, the defendants,
WILLIAM C. LEE, a/k/a "Doc" or "Pluck," WILLIAM HOLLEY, JR., a/k/a "Chill," ROBERT
E. BEELER,
JASON T. NICHOLS, and TOCCARA L.
PORTER, and other persons known and unknown to the Grand Jury, did knowingly,
intentionally, and without authority combine, conspire, confederate and agree with each other
and with diverse others to distribute one hundred (100) grams or more of a mixture or substance
containing a detectable amount of heroin, a Schedule I controlled substance, forty (40) grams or
more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, and ten
(10) grams of more of a mixture and substance containing a detectable amount of N-(1phenethylpiperidin-4-yl)-N-phenylacetamide (acetyl fentanyl), a Schedule I controlled substance
and analogue of fentanyl, in violation of Title 21, United States Code, Sections 846, 841(a)(1),
and 841(b)(1)(B).

COUNT TWO

The Grand Jury further charges that, from on or about July 1, 2020, through on or about October 20, 2020, within the Eastern District of Tennessee and elsewhere, the defendants, WILLIAM C. LEE, a/k/a "Doc" or "Pluck," WILLIAM HOLLEY, JR., a/k/a "Chill," and TOCCARA L. PORTER, did knowingly, intentionally, and without authority combine, conspire, confederate and agree with each other and with diverse others to distribute fifty (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

NOTICE OF ENHANCED PENALTY UNDER TITLE 21 U.S.C. § 841(b)(1)(A) (Prior Conviction of Serious Violent Felony)

Before committing the offenses charged in Counts One and Two of this Indictment, the defendant, WILLIAM HOLLEY, JR., a/k/a "Chill," had at least one final conviction for a serious violent felony, for which he served at least 12 months in custody and was released from custody no more than 15 years before the commencement of the offenses charged in Counts One and Two. As a result, the defendant, WILLIAM HOLLEY, JR., a/k/a "Chill," is subject to an enhanced penalty under Title 21, United States Code, Sections 841(b)(1)(A), 841(b)(1)(B) and 851.

COUNT THREE

The Grand Jury further charges that, on or about August 4, 2020, in the Eastern District of Tennessee, the defendant, ROBERT E. BEELER, did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(A).

COUNT FOUR

The Grand Jury further charges that, on or about August 4, 2020, in the Eastern District of Tennessee, the defendant, ROBERT E. BEELER, did knowingly possessed firearms in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute controlled substances and possession with intent to distribute a controlled substance as set forth in Counts One and Three of this Indictment, the description of which is fully incorporated herein, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE

The Grand Jury further charges that on or about August 4, 2020, in the Eastern District of Tennessee, the defendant, ROBERT E. BEELER, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess firearms and ammunition, and those firearms and ammunition having been transported in interstate commerce, in violation Title 18, United States Code, Section 922(g)(1).

DRUG TRAFFICKING FORFEITURE ALLEGATIONS

The allegations contained in Counts One, Two, and Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 846 and/or 841, the defendants, WILLIAM C. LEE, a/k/a "Doc" or "Pluck," WILLIAM HOLLEY, JR., a/k/a "Chill," and ROBERT E. BEELER, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in

any manner or part, to commit, or to facilitate the commission of the offense, including but not limited to the following:

Money Judgment

Proceeds the defendants, WILLIAM C. LEE, a/k/a "Doc" or "Pluck," WILLIAM HOLLEY, JR., a/k/a "Chill," and ROBERT E. BEELER, personally obtained as a result of the violations of Title 21, United States Code, Sections 841 and/or 846.

Pursuant to Title 21, United States Code, Section 853(p), the defendant shall forfeit substitute property, up to the value of the property subject to forfeiture, if by any act or omission of the defendant, the property, or any portion thereof:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty.

FIREARM FORFEITURE ALLEGATIONS

The allegations contained in Counts Four and Five of this Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense in violation of Title 18, United States Code, Sections 922(g)(1) and/or 924(c)(1)(A) as set forth in this Indictment, the defendant, ROBERT E. BEELER, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), defendants shall forfeit substitute property, up to the value

of the property subject to forfeiture, if by any act or omission of the defendant, the property, or any portion thereof:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

A TRUE BILL:

SIGNATURE REDACTED

GRAND JURY FOREPERSON

J. DOUGLAS OVERBEY UNITED STATES ATTORNEY

BRENT N. JONES

Assistant United States Attorney

Place of	Offense (City & County): Knoxville,	Knox County		
Defenda	nt Information:			
Juvenile	Yes_X No Mat	ter to be Sealed:	X_Yes _	No
Defenda	nt Name: William Curtis Lee, a/k/a	"Doc" or "Pluck"		
Interprete	er: No <u>X</u> Yes Lan	guage	· · · · · · · · · · · · · · · · · · ·	
Total # o	f Counts: Petty Mis	demeanor (Class)2	Felony
	ORIGI U.S.C. Citation(s) and Descr		arged	Count(s)
Set 1	Conspiracy to distribute 100 grams or mo containing heroin, 40 grams or more of a fentanyl, and 10 grams or more of a mixtu fentanyl; 21 U.S.C. §§§ 846, 841(a)(1), 8-	mixture and substance ure and substance con	containing	1
Set 2	Conspiracy to distribute 50 grams or more U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)	e of actual methamphe	etamine; 21	2
	SUPERSEDING INDICTMENT U.S.C. Citation(s) and Description Offense Charged	New count? Y or N	New Count #	Old Count # (if applicable)
Set 1				
Criminal (. ,	Case No.		
<u>Crimina</u>	ber Defendant's attorney I Informations: criminal case: No Yes			PMANA
New Sep	arate Case	Supersedes Pendin	g Case	
Name of	defendant's attorney:			
Retained	: Appointed:	_	4	
Date: <i>[0]</i>	/20/2020 Signature	of AUSA: BINC		

Place of	Offense (City & County): Knoxville, Kno	x County					
Defenda	ant Information:						
Juvenile	Yes_X No Matter to	be Sealed:	X_Yes	No			
Defenda	ant Name: <u>William Holley, Jr., a/k/a "Chil</u>	<u>"</u>					
Interpret	ter: No <u>X</u> Yes Languag	je		***************************************			
Total # o	of Counts: Petty Misdem	eanor (Class ₋)2	Felony			
	ORIGINAL U.S.C. Citation(s) and Description	n of Offense Cha	arged	Count(s)			
Set 1	containing heroin, 40 grams or more of a mixtu	Conspiracy to distribute 100 grams or more of a mixture and substance containing heroin, 40 grams or more of a mixture and substance containing fentanyl, and 10 grams or more of a mixture and substance containing acetyl fentanyl; 21 LLS C. 88 846, 841(a)(1), 841(b)(1)(B)					
Set 2	Conspiracy to distribute 50 grams or more of a U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)	ctual methamphe	etamine; 21	2			
	SUPERSEDING INDICTMENT U.S.C. Citation(s) and Description of Offense Charged	New count? Y or N	New Count #	Old Count # (if applicable)			
Set 1							
Criminal	Trial Date (if set): Complaint Filed: No Yes Case(s):						
<u>Crimina</u>	nber Defendant's attorney Ho al Informations: criminal case: No Yes						
New Sep	parate Case Supe	rsedes Pendin	g Case				
Name of	f defendant's attorney:						
	d: Appointed:		1				
Date:	10/20/2020 Signature of Al	USA: <u>ろみ</u> ん	1.4_				

Place of	Offense	(City &	Cour	nty): Kn	oxville, Knox	County		
Defenda	nt Inform	ation:						
Juvenile		Yes_	X	No	Matter to	be Sealed:	X_Yes	No
Defenda	nt Name:	Rob	ert E.	<u>Beeler</u>				
Interpret	er: No	X	_ [/] Ye	es	_ Languag	e		
Total # o	f Counts:	<u></u>	Pe	tty	Misdeme	eanor (Class ₋)4	Felony
		U.S.C	. Citati	ion(s) an	ORIGINAL d Description	of Offense Cha	arged	Count(s)
Set 1	containin fentanyl,	ng heroir and 10	n, 40 gr grams	rams or m or more o	ore of a mixtur	a mixture and sub re and substance d substance con n(B)	containing	1
Set 2						or more of actua and 841(b)(1)(3
Set 3	Possess 924(c)(1		urther	ance of a	a drug traffick	ing crime; 18 U	.S.C. §	4
Set 4								5
		C. Citati	on(s) a	S INDICT and Desc Charged	MENT cription of	New count? Y or N	New Count #	Old Count # (if applicable)
Set 1								
Current 7	rial Date	(if set):			before Ju	dge	
Criminal	Complair	nt Filed	l: No		_ Yes	Case No.		
Related (• • •							
Crimina	I Inform	ations	S :		Ho Yes	w related Case No.		
						sedes Pendin		
Name of	defendaı	nt's att	orney:	:				
Retained	:	-	Ар	pointed:		JSA: BIN	1	
Date: 16	0/20/202	0		Sia	nature of AL	ISA: (BIN	1.4_	

Place of	Offense (City & County): Knoxville, Knox	County				
Defenda	nt Information:					
Juvenile	Yes_X_ No Matter to	be Sealed:	X_Yes	No		
Defenda	nt Name: <u>James Canty III, a/k/a "Duke"</u>					
Interpret	er: No <u>X</u> Yes Language	e				
Total # o	f Counts: Petty Misdeme	eanor (Class ₋)1	Felony		
	ORIGINAL U.S.C. Citation(s) and Description	of Offense Cha	arged	Count(s)		
Set 1	Conspiracy to distribute 100 grams or more of a mixture and substance containing heroin, 40 grams or more of a mixture and substance containing fentanyl, and 10 grams or more of a mixture and substance containing acetyl fentanyl; 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)					
	SUPERSEDING INDICTMENT U.S.C. Citation(s) and Description of Offense Charged New count? Y or N #					
Set 1						
	Trial Date (if set): Complaint Filed: No Yes Case(s):					
<u>Crimina</u>	ber Defendant's attorney Hor I Informations: criminal case: No Yes					
New Sep	arate Case Super	sedes Pendin	g Case			
Name of	defendant's attorney:			Proprietation		
	: Appointed:	_	1			
Date: 10	2/20/2020 Signature of AU	ISA: RIN.	4			

CRIMINAL CASE COVER SHEET

U.S. ATTORNEY'S OFFICE

Place of	Offense (City & County): Kno	xville, Knox	County		
Defenda	nt Information:				
Juvenile	Yes_X No	Matter to	be Sealed:	X_Yes	No
Defenda	nt Name: <u>Jason T. Nichols</u>				
Interpret	er: No <u>X</u> Yes	Language	e		
Total # o	of Counts: Petty	_ Misdeme	eanor (Class _)1	Felony
	U.S.C. Citation(s) and	ORIGINAL Description	of Offense Cha	arged	Count(s)
Set 1	Conspiracy to distribute 100 grams containing heroin, 40 grams or mofentanyl, and 10 grams or more of fentanyl; 21 U.S.C. §§ 846, 841(a)	re of a mixture a mixture and	e and substance I substance cont	containing	1
	SUPERSEDING INDICTN U.S.C. Citation(s) and Descr Offense Charged		New count? Y or N	New Count #	Old Count # (if applicable)
Set 1					арричало
Current	Гrial Date (if set):		before Ju	dge	
	Complaint Filed: No				
Related (Case(s):				
<u>Crimina</u>	ber Defendant's attorney I Informations:				
Pending	criminal case: No	Yes	Case No.		
New Sep	parate Case	Supers	sedes Pendin	g Case	
Name of	defendant's attorney:				
Retained	: Appointed:			4	
Date: <i>I</i>	<i>0/20/2020</i> Sign	ature of AU	SA: BINC	<u> </u>	

Place of	Offense (City	y & County):	Knoxville, Knox	County		
Defenda	nt Informatio	n:				
Juvenile	Yes	s_X No	Matter to	be Sealed:	X_ Yes _	No
Defenda	nt Name: <u>T</u>	occara L. Por	ter			
Interpret	er: No>	< Yes	Language	e		
Total # o	of Counts: _	Petty _	Misdeme	eanor (Class ₋)2	Felony
	U.S	S.C. Citation(s)	ORIGINAL) and Description	of Offense Cha	arged	Count(s)
Set 1	Conspiracy to distribute 100 grams or more of a mixture and substance containing heroin, 40 grams or more of a mixture and substance containing fentanyl, and 10 grams or more of a mixture and substance containing acetyl fentanyl; 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)					1
Set 2		o distribute 50 g 6, 841(a)(1), 84	rams or more of ac 1(b)(1)(A)	tual methamphe	tamine; 21	2
		RSEDING IND itation(s) and I Offense Charg	Description of	New count? Y or N	New Count #	Old Count # (if applicable)
Set 1						
	Complaint F	-	Yes		dge	
<u>Crimina</u>	ıl Informatio	ons:	rney Ho		WARMING THE CONTROL OF THE CONTROL O	
			Supers			
Name of	defendant's	attorney:				
		Appoint			1	
Date: /	0/20/2020		Signature of AU	ISA: <u>ろり</u>	1.4_	